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REMARKS

Claims 1-9 are pending in the application. Favorable reconsideration of the application is respectfully requested.

I. *WITHDRAWAL OF PREVIOUS REJECTIONS*

Applicant notes with appreciation the withdrawal of the previous art rejections. Further, applicant acknowledges the Examiner's continued careful examination of the application.

II. *REJECTION OF CLAIMS 1-3 AND 7-9 UNDER 35 USC §103(a)*

Claims 1-3 and 7-9 now stand rejected under 35 USC §103(a) based on *Applicant's Admitted Prior Art (hereinafter "AAPA") in view of Inaba et al.* Withdrawal of the rejection is respectfully requested for at least the following reasons.

More specifically, the Examiner contends that *AAPA* teaches forming a structure for each of at least some of the strings, in which structure a string is associated with each text unit in which the string occurs, as recited in claim 1. Such feature of the claimed invention is illustrated, for example, on page 19 of the application, line 21. Specifically, a structure for the word "apple" illustrates each text unit, or sentence, in which the word apple appears.

The Examiner argues that pages 4 and 5 of the present application, representing *AAPA*, illustrates forming a structure for each of at least some strings, in which structure a string is associated with each text unit in which the string occurs as recited in claim 1.

Applicant respectfully submits, however, that pages 4 and 5 of the present application describe an approach in which each of the possible pairs of text units or sentences is evaluated in order to see the number of shared words therebetween. In other words, *AAPA* teaches forming a structure for each pair of text units in which a string is associated with each pair of text units in which the string occurs. Consequently, *AAPA* requires the counting of the number of strings shared between all possible pairs of text units. (See e.g., page 8, lines 13-16)

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In other words, the present invention involves forming a structure which identifies initially the text units in which the string occurs. The *AAPA*, on the other hand, develops a structure which indicates what words or strings are shared among each possible pair of text units.

Accordingly, it will be appreciated that *AAPA* does not teach "forming a structure...in which a string occurs" as recited in claim 1. Moreover, *Inaba et al.* does not make up for such deficiencies in *AAPA*. Thus, even if the teachings of *AAPA* and *Inaba et al.* were to be combined as proposed by the Examiner, the claimed invention would not result.

Claims 2-3 and 7-9 each depend from claim 1 either directly or indirectly. Therefore, these claims may be distinguished over the teachings of *AAPA* and *Inaba et al.* for at least the same reasons as claim 1.¹

Withdrawal of the rejection is respectfully requested.

III. REJECTIONS OF CLAIMS 4-6 UNDER 35 USC §103(a)

Claim 4 is rejected under 35 USC §103(a) based on *AAPA* in view of *Inaba et al.*, and further in view of *Liddy*. Claims 5 and 6 are rejected under 35 USC §103(a) based on *AAPA* in view of *Inaba et al.*, and further in view of *Liddy* and *Baker*. Each of these rejections is respectfully traversed for at least the following reasons.

Claims 4-6 and 8 each depend from claim 1, either directly or indirectly. As a result, each can be distinguished over the teachings of *AAPA* and *Inaba et al.* for at

¹Applicant feels it may be helpful to point out that the use of the term "co-occurrence" is different in *Inaba et al.* than in *AAPA*, and this may otherwise cause some confusion to the Examiner. In *Inaba et al.*, "co-occurrence" refers to two words co-occurring in the same document or text unit. Thus, in *Inaba et al.*, a word co-occurrence index is really just a regular word index, with words replaced by co-occurrences. And so, the word co-occurrence index actually has nothing to do with "storing the degree of coincidence between document and the document text and words" (See, e.g., Office Action, p. 3). In *AAPA* and the present invention, "co-occurrence" is not used but conceptually the idea is that "pairs" refers to pairs of text units that contain the same word, which is very different from the word "co-occurrence" in *Inaba et al.*

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least the same reasons discussed above. Furthermore, neither *Liddy* nor *Baker* make up for the deficiencies. Consequently, withdrawal of the rejections is respectfully requested.

IV. CONCLUSION


Accordingly, all claims 1-9 are believed to be allowable and the application is believed to be in condition for allowance. A prompt action to such end is earnestly solicited.

Should the Examiner feel that a telephone interview would be helpful to facilitate favorable prosecution of the above-identified application, the Examiner is invited to contact the undersigned at the telephone number provided below.

Should a petition for an extension of time be necessary for the timely reply to the outstanding Office Action (or if such a petition has been made and an additional extension is necessary), petition is hereby made and the Commissioner is authorized to charge any fees (including additional claim fees) to Deposit Account No. 18-0988.

Respectfully submitted,

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